

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GIDEON RAPAPORT,	X
	:
Plaintiff,	:
	:
- against -	:
	:
RICHARD ALLEN EPSTEIN, MITCHELL	:
KEVALLA PALLAKI, AJAY	:
SRINIVASAN IYER, ZACHARY	:
GEORGE GARRETT, WILLIAM STUART	:
LASSETER WEINBERG, ANDREW	:
NELMS, JOHN DOES 1-3,	:
	:
Defendants.	:
	:

X

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, Defendant Richard A. Epstein, by and through his undersigned counsel, will move this Court before the Honorable Jessica G. L. Clarke at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order dismissing Plaintiff Gideon Rapaport's First Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: New York, New York
July 15, 2025

Respectfully submitted,

/s/ Jeremy Chase
Jeremy Chase
Gerald Stein
Nimra H. Azmi
DAVIS WRIGHT TREMAINE LLP
1251 Avenue of the Americas, 21st Floor
New York, NY 10020-1104
Phone: (212) 489-8230
jeremychase@dwt.com
geraldstein@dwt.com
nimraazmi@dwt.com

Attorneys for Richard A. Epstein